

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FULL CIRCLE UNITED, LLC,

Plaintiff,

-against-

BAY TEK ENTERTAINMENT, INC.,

Defendant.

Case No: 20 Civ. 3395 (BMC)

BAY TEK ENTERTAINMENT, INC.,

Counterclaim-Plaintiff,

-against-

FULL CIRCLE UNITED, LLC, and ERIC PAVONY,

Counterclaim-Defendants.

**DECLARATION OF ROBERT
GLUNT**

I, ROBERT GLUNT declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney at Mandel Bhandari LLP, counsel for Plaintiff Full Circle United, LLC.

2. I submit this declaration in support of Plaintiff's Motions *in Limine*. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently hereto.

3. Attached hereto as Exhibit A is a true and accurate copy of the transcript of the February 7, 2025 Pretrial Conference in this action.

4. Attached hereto as Exhibit B is a true and accurate copy of excerpts of the June 14, 2022 deposition of Eric Pavony.

5. Attached hereto as Exhibit C are true and accurate copies of excerpts of certain depositions in this action.

6. I respectfully request that the Court grant Plaintiff's motions *in limine*.

Dated: February 28, 2025
New York New York

/s/ Robert Glunt
Robert Glunt